

## **Remarks/Arguments**

Claims 1-18 are pending. Applicants amended claims 1-2 to state that the printer is adapted to perform the recited operations. In the Office Action mailed May 31, 2007, the Examiner rejected claims 1-3 and 5-18 under 35 U.S.C. §102(c) as anticipated by Nguyen et al. (U.S. Patent No. 7,079,264). The Examiner rejected claim 4 under 35 U.S.C. §103(a) as unpatentable over Nguyen in view of McConnell (U.S. Patent No. 5,526,477).

Applicants respectfully traverse the rejections and request reconsideration and withdrawal thereof.

### **35 U.S.C. §102(e) Rejection**

The Examiner rejected claims 1-3 and 5-18 under 35 U.S.C. §102(c) as anticipated by Nguyen. Applicants traverse the Examiner's 35 U.S.C. §102(c) rejection, as Nguyen does not teach all of the limitations of the present claims. The rejections will be discussed in regard to independent claim 1.

Independent claim 1 recites a printer for printing an encoded data stream, the data stream capable of including a section of complex text data. The printer comprises a text parser adapted to parse the encoded data stream to determine the section of complex text data in the encoded data stream. The printer also includes a layout engine adapted to receive the section of complex text data from the text parser, and for determining at least one glyph of a font in the printer corresponding to the section of complex text data. Because the glyphs displayed for complex text depend on the context in which the complex text is used within the data stream, the printer operates to parse the complex text data to determine the correct glyph to display for the complex text data.

By contrast, Nguyen teaches a computer system and method for outputting printer commands to a printer in response to a print request from an application program. A printer includes a device font whose characters are addressed for printing via single, double, or n-byte codes. The text data to be printed utilizes the Unicode Standard to identify its characters. The system includes a graphics device interface that is compatible to read the Unicode data, and to invoke the printer driver functions for controlling the outputting of the text data to the printer. A printer OEM supplied minidriver contains a

characterization of the printer, including information identifying the device font resident in the printer and the code used to identify the individual characters of the font. A printer driver uses this information to translate the text data to be printed from the Unicode Standard to a code capable of selecting a device font provided character. (Abstract of Nguyen)

Nguyen does not teach or reasonably suggest a printer including "a text parser adapted to parse the encoded data stream to determine the section of complex text data in the encoded data stream". The Examiner states that this limitation is taught by Nguyen in FIG. 2 (as GPD parser 104). The Examiner states that GPD parser 104 parses the text based GPD file into internal binary data structures. However, the GPD parser 102 is located on the host system attached to a printer.

GPD parser 102 is part of an operating system/printer driver application typically utilized on a host system that is attached to a printer. GPD parser 104 parses a text based GPD file into internal binary data structures 106 (see col. 7, lines 17-19 of Nguyen). These internal binary data structures 106 are utilized by a printer driver (e.g., driver rendering DLL 112 and driver user interface 108 (see FIG. 2) located on the host system) (see col. 7, lines 19-21 of Nguyen). DLL 112 (i.e., control module 116 of DLL 112) is operable to transmit data to a printer (see col. 7, lines 47-49 of Nguyen). Control module 116 is the module on the host system that actually communicates with a printer. None of the elements illustrated on FIG. 2 are processes that operate on a printer. Thus, Applicants assert that GPD parser 104 of Nguyen is not a text parser of a printer as recited by Nguyen.

Further, GPD parser 104 of Nguyen does not parse an encoded data stream to determine a section of complex text data in the encoded data stream. The data that GPD parser 104 parses is not even data that is printed by a printer. Rather, GPD parser 104 parses a GPD file, which describes all the features on a printer and how to display and invoke these features (see col. 7, lines 7-17, and application 09/157,895, incorporated by reference by Nguyen and defining a GPD file). The GPD file also contains printer-specific commands and attributes that enable a Unidrv5 to generate the correct printer-ready output data (see application 09/157,895). Thus, the GPD file is not an encoded data stream to be printed by a printer. Further, the encoded data stream does not

comprise complex text data, which is generally understood in the art as text containing characters which are represented by different glyphs depending on the context of the characters. Nguyen does not describe any parsing of complex data. Thus, Applicants submit that Nguyen does not teach the text parser recited by independent claim 1.

Nguyen also does not teach "a layout engine coupled to the text parser, the layout engine adapted to receive the section of complex text data from the text parser and for determining at least one of a plurality of glyphs corresponding to the section of complex text data". The Examiner asserts the Nguyen teaches a layout engine as control module 116. However, as discussed above, control module 116 is not contained in a printer, because control module 116 transmits data to a printer. Further, Nguyen does not teach any parsing of complex text data as understood by those of ordinary skill in the art. Thus, because Nguyen does not parse any complex text data, Nguyen does not have any complex text data information for control module 116 to determine a glyph corresponding to the complex text data. Applicants submit that Nguyen does not teach the layout engine recited by independent claim 1.

For at least the reasons outlined, Applicants submit the Nguyen does not teach the printer of independent claim 1. These same arguments also apply to independent claims 10 and 11. These same arguments also apply to dependent claims 2-3, 5-9 and 12-18. Additionally, dependent claims 2-3, 5-9 and 12-18 include additional limitations not disclosed by the prior art of record. Applicants therefore respectfully request reconsideration and withdrawal of the 35 U.S.C. §102(e) rejection of claims 1-3 and 5-18.

### **35 U.S.C. §103(a) Rejection**

The Examiner rejected claim 4 under 35 U.S.C. §103(a) as unpatentable over Nguyen in view of McConnell. As discussed above, Nguyen does not teach the printer of independent claim 1. Thus, Applicants submit that claim 4 is allowable for the same reasons outlined above, and allowable as depending from an allowable base claim.

**Conclusion**

Applicants maintain that all independent claims 1, 10 and 11 are now allowable over all prior art of record (considered individually or in any combination). Further, remaining dependent claims 2-9 and 12-18 are also allowable for the same reasons discussed above and as depending from allowable base claims. Still further, dependent claims 2-9 and 12-18 recite additional limitations not disclosed by the prior art. Applicants therefore respectfully request reconsideration and withdrawal of the rejections.

Respectfully submitted,

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